

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

SEITU SULAYMAN KOKAYI,

Defendant.

CRIMINAL NO.: 1:18-CR-410

Count 1: Coercion and Enticement of a Minor
(18 U.S.C. § 2422(b))

Count 2: Coercion and Enticement of a Minor
(18 U.S.C. § 2422(b))

Count 3: Transfer of Obscene Materials to a
Minor (18 U.S.C. § 1470)

NOVEMBER 2018 TERM – AT ALEXANDRIA, VIRGINIA

INDICTMENT

COUNT ONE

(Coercion and Enticement of a Minor)

THE GRAND JURY CHARGES THAT:

From on or about August 2, 2018, and continuing through on or about August 22, 2018, within the Eastern District of Virginia and elsewhere, the defendant, SEITU SULAYMAN KOKAYI, did knowingly use a facility or means of interstate commerce to knowingly persuade, induce, entice and coerce and attempt to persuade, induce, entice and coerce a fifteen year-old girl to engage in sexual activity for which any person can be charged with a criminal offense, specifically, to produce child pornography in violation of Title 18, United States Code, Section 2251, Code of Virginia, Section 18.2-374.1, and Minnesota Statutes, Section 617.246.

(In violation of Title 18 United States Code, Section 2422(b))

COUNT TWO

(Coercion and Enticement of a Minor)

THE GRAND JURY FURTHER CHARGES THAT:

From on or about August 2, 2018, and continuing through on or about August 22, 2018, within the Eastern District of Virginia and elsewhere, the defendant, SEITU SULAYMAN KOKAYI, did knowingly use a facility or means of interstate commerce to knowingly persuade, induce, entice and coerce and attempt to persuade, induce, entice and coerce a fifteen year-old girl to engage in sexual activity for which any person can be charged with a criminal offense, specifically, to engage in sexual relations, sexual contact, and sexual acts with KOKAYI, a twenty-nine year-old man, in violation of Code of Virginia, Section 18.2-371, Code of the District of Columbia, Section 22-3008, and Code of Maryland, Criminal Law, Section 3-307(a)(4) and (5).

(In violation of Title 18 United States Code, Section 2422(b))

COUNT THREE

(Transfer of Obscene Materials to a Minor)

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about August 2, 2018 and on or about August 22, 2018, within the Eastern District of Virginia and elsewhere, the defendant, SEITU SULAYMAN KOKAYI, did knowingly use a facility or means of interstate commerce to knowingly transfer and attempt to transfer obscene matter, specifically, a live video depiction of his penis and him masturbating, to another individual who has not attained the age of 16 years, knowing that such other individual has not attained the age of 16 years.

(In violation of Title 18 United States Code, Section 1470)

NOTICE OF FORFEITURE

1. There is probable cause that the property described in this NOTICE OF FORFEITURE is subject to forfeiture pursuant to the statutes described herein.

2. Upon conviction of any of the offenses set forth in this Indictment, the defendant, SEITU SULAYMAN KOKAYI, shall forfeit to the United States of America any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense of conviction, including an Apple iPhone X, Model A1865 bearing Serial No. F2LVQ3W2JCLG with IMEI 356718086078711.

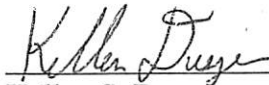
(All pursuant to Title 18, United States Code, Section 2428; Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c))

A TRUE BILL:

Pursuant to the E-Government Act.,
The original of this page has been filed
under seal in the Clerk's Office

For person of the Grand Jury

G. Zachary Terwilliger
United States Attorney



Kellen S. Dwyer
Dennis M. Fitzpatrick
Assistant United States Attorneys